

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
STRIKE, LLC, <i>et al.</i> ¹)	
)	Case No. 21-90054 (DRJ)
Debtors.)	(Jointly Administered)
)	

**DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED
FOR DECEMBER 22, 2021, AT 10:30 A.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file their Witness and Exhibit List for the hearing to be held on **December 22, 2021, at 10:30 a.m. (prevailing Central Time)** (the “Hearing”) as follows:

WITNESSES

The Debtors may call the following witnesses at the Hearing:

1. Sean Gore, Executive Vice President and Chief Financial Officer of Strike, LLC;
2. Ryan Bouley, Opportune LLP;
3. Noni Garcia, Director Growth Initiatives for Ritchie Bros. Auctioneers (America) Inc.;
4. Any witness listed by any other party;
5. Rebuttal witnesses as necessary; and
6. The Debtors reserve the right to cross-examine any witness called by any other party.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ federal tax identification number, are: Strike, LLC (2120); Strike HoldCo, LLC (0607); Delta Directional Drilling, LLC (9896); Strike Global Holdings, LLC (4661); Capstone Infrastructure Services, LLC (0161); and Crossfire, LLC (7582). The location of Debtor Strike, LLC’s principal place of business and the Debtors’ service address is: 1800 Hughes Landing Boulevard, Suite 500, The Woodlands, Texas 77380. Additional information regarding this case may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/StrikeLLC>.

EXHIBITS

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1.	Asset Purchase Agreement [Docket No. 60-1]						
2.	The Project KERP Participants Sizing List [Docket No. 196] filed under seal						
3.	The Program KERP Participants Sizing List [Docket No. 196] filed under seal						
4.	RB Agreement #1 [Docket No. 199] filed under seal						
5.	RB Agreement #2 [Docket No. 199] filed under seal						
6.	RB Agreement #3 [Docket No. 199] filed under seal						
7.	RB Agreement #4 [Docket No. 199] filed under seal						
8.	RB Agreement #5 [Docket No. 199] filed under seal						
9.	RB Agreement #6 [Docket No. 199] filed under seal						
10.	Sale Assets [Docket No. 198-1]						
11.	AFCO Premium Financing Agreement [Docket No. 193-1]						
	Any document or pleading filed in the above-captioned main cases						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

RESERVATION OF RIGHTS

The Debtors reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the Hearing.

Houston, Texas
December 20, 2021

/s/ Matthew D. Cavanaugh

JACKSON WALKER LLP

Matthew D. Cavanaugh (TX Bar No. 24062656)
Kristhy Peguero (TX Bar No. 24102776)
Genevieve Graham (TX Bar No. 24085340)
1401 McKinney Street, Suite 1900
Houston, Texas 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: mcavanaugh@jw.com
Email: kpeguero@jw.com
Email: ggraham@jw.com

*Proposed Co-Counsel to the Debtors and
Debtors in Possession*

WHITE & CASE LLP

Thomas E Lauria (TX Bar No. 11998025)
Matthew C. Brown (admitted *pro hac vice*)
Fan B. He (admitted *pro hac vice*)
Gregory L. Warren (admitted *pro hac vice*)
200 South Biscayne Boulevard, Suite 900
Miami, FL 33131
Telephone: (305) 371-2700
Email: tlauria@whitecase.com
Email: mbrown@whitecase.com
Email: fhe@whitecase.com
Email: gregory.warren@whitecase.com

Andrew F. O'Neill (admitted *pro hac vice*)
111 South Wacker Drive, Suite 5100
Chicago, IL 60606
Telephone: (312) 881-5400
Email: aoneill@whitecase.com

Charles Koster (admitted *pro hac vice*)
609 Main Street, Suite 2900
Houston, TX 77002
Telephone: (713) 496-9700
Email: charles.koster@whitecase.com

Aaron Colodny (admitted *pro hac vice*)
R.J. Szuba (admitted *pro hac vice*)
555 South Flower Street, Suite 2700
Los Angeles, CA 90071
Telephone: (213) 620-7700
Email: aaron.colodny@whitecase.com
Email: rj.szuba@whitecase.com

*Proposed Counsel to the Debtors and
Debtors in Possession*

Certificate of Service

I certify that on December 20, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh
Matthew D. Cavanaugh